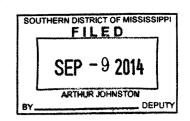
IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI EASTERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. J. HA139 KS-MTP

FREDRICK DONELL BOOTH a/k/a D and SHALONDA HILL

21 U.S.C. § 846 21 U.S.C. § 841(a)(1) 18 U.S.C. § 1956(h) 18 U.S.C. § 1956(a)(1)(B)(i) 18 U.S.C. § 1957

The Grand Jury charges:

COUNT 1

That beginning at least as early as 2009 and continuing up to the date of this Indictment, in Forrest County, in the Eastern Division of the Southern District of Mississippi, and elsewhere, the defendant, FREDRICK DONELL BOOTH a/k/a D, did knowingly conspire with others both known and unknown to the Grand Jury, to possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II drug controlled substance, and 100 kilograms or more of mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, and Section 2, Title 18, United States Code.

COUNT 2

From on or about September 5, 2012 through September 26, 2012, in the Eastern

Division of the Southern District of Mississippi, the defendants, FREDRICK DONELL

BOOTH a/k/a D and SHALONDA HILL, did knowingly combine, conspire, and agree with

each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is distribution of controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Section 1956(a)(1)(B)(i), Title 18, United States Code.

MANNER AND MEANS

The defendants, FREDRICK DONELL BOOTH a/k/a D and SHALONDA HILL, incurred losses and seizures that far exceeded their legitimate income.

The defendants, **FREDRICK DONELL BOOTH a/k/a D and SHALONDA HILL**, had no legitimate means to provide \$150,000.00 in cash for the purchase of a residence located at 73 Ellzey Lane, Hattiesburg, Mississippi ("the residence").

On September 5, 2012, defendant **SHALONDA HILL** called the owners the residence to discuss the purchase of that residence.

On September 8, 2012, defendants FREDRICK DONELL BOOTH a/k/a D and SHALONDA HILL, toured the residence and thereafter agreed to purchase the residence for \$175,000.00.

On September 17, 2012, the owners of the residence agreed with defendant **SHALONDA HILL** to finance \$25,000.00 of the purchase price and a closing date was set for September 25, 2012.

On September 24, 2012, defendant SHALONDA HILL spoke with the owners of the residence about taking \$150,000.00 in cash to the bank in order to obtain a cashier's check.

The owners of the residence agreed to take the cash and get a cashier's check for the defendants, FREDRICK DONELL BOOTH a/k/a D and SHALONDA HILL.

On September 26, 2012, defendant **FREDRICK DONELL BOOTH** a/k/a **D** brought \$150,000.00 in cash to the owners of the residence. The owners took the cash to Community Bank in Hattiesburg in order to obtain a cashier's check.

All in violation of Section 1956(h), Title 18, United States Code.

COUNT 3

On or about September 26, 2014, in the Eastern Division of the Southern District of Mississippi, the defendants, **FREDRICK DONELL BOOTH** a/k/a **D** and **SHALONDA HILL**, aided and abetted by others known and unknown to the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the conversion of \$150,000.00 cash into a cashier's check, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, source, ownership and control of the proceeds of said unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Sections 1956(a)(1)(B)(i) and 2, Title 18, United States Code.

COUNT 4

On or about September 26, 2012, in the Eastern Division of the Southern District of Mississippi, the defendants, FREDRICK DONELL BOOTH a/k/a D and SHALONDA HILL, aided and abetted by others known and unknown to the grand jury, did knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting

interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is paid \$150,000.00 in U.S. currency for the purchase of a residence, such property having been derived from a specified unlawful activity, that is, distribution of controlled substances, in violation of Section 841(a))(1), Title 21, United States Code.

In violation of Sections 1957 and 2, Title 18, United States Code.

COUNT 5

On or about May 31, 2013, in the Southern Division of the Southern District of Mississippi, the defendant, **FREDRICK DONELL BOOTH a/k/a D**, aided and abetted by others known and unknown to the grand jury, did knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is cash transaction in \$14,800.00 of U.S. currency at the Hard Rock Casino, such property having been derived from a specified unlawful activity, that is, distribution of controlled substances, in violation of Section 841(a)(1), Title 21, United States Code.

All in violation of Sections 1957 and 2, Title 18, United States Code.

COUNT 6

On or about September 1, 2013, in the Southern Division of the Southern District of Mississippi, the defendant, **FREDRICK DONELL BOOTH** a/k/a **D**, aided and abetted by others known and unknown to the grand jury, did knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is cash transaction in \$10,400.00 of U.S. currency at the Hard Rock Casino, such property having been derived from a specified unlawful activity, that is, distribution of controlled substances, in violation of Section 841(a)(1), Title 21, United States Code.

All in violation of Sections 1957 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offense. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code and Section 982(a)(1), Title 18, United States Code.

GREGORY K. DAVIS United States Attorney

A TRUE BILL:

s/ signature redacted

Foreperson of the Grand Jury

UNITED STATES MAGISTRATE JUDGE